

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

**WSOU INVESTMENTS, LLC d/b/a
BRAZOS LICENSING AND
DEVELOPMENT,**

Plaintiff,

v.

ZTE CORPORATION,

Defendant.

Civil Action No.: 6:20-cv-00494-ADA

JURY TRIAL DEMANDED

**[PROPOSED] JOINT MOTION TO STAY BRIEFING DEADLINES FOR SUMMARY
JUDGMENT OF INVALIDITY FOR LACK OF SUBJECT MATTER ELIGIBILITY
(Dkt. 234)**

This Court, having considered a joint motion by Defendant ZTE Corporation (“Defendant”) and Plaintiff WSOU Investments, LLC d/b/a Brazos Licensing and Development (“Plaintiff”) to stay briefing deadlines for the Summary Judgment of Invalidity for Lack of Subject Matter Eligibility under 35 U.S.C. § 101 (Dkts. 234, 245, 262), hereby ORDERS a stay to all briefing deadlines for the Summary Judgment of Invalidity for Lack of Subject Matter Eligibility under 35 U.S.C. § 101 (Dkts. 234, 245, 262) until the Court resolves the forthcoming dispute pertaining to Defendant’s request of a limited half-day deposition of Plaintiff’s expert, Dr. Aaron Striegel, with respect to his expert declaration submitted for Plaintiff’s Opposition to Defendant’s Motion for Summary Judgment for Ineligibility under 35 U.S.C. § 101 in C.A. No. 6:20-cv-00494-ADA (Dkt. 262); and the stay is to be consistent with the dispositive motions briefing

schedule set forth in the Scheduling Order.

The above briefing stay does not change the date of any hearing, trial, or other Court date, or extend any deadline of a final submission that affects the Court's ability to hold a scheduled hearing, trial, or Court event.

Signed this [date].

[Proposed Order]

DEREK GILLILAND
UNITED STATES MAGISTRATE JUDGE

Dated: November 30, 2022

RESPECTFULLY SUBMITTED,

By: /s/ Jonathan K. Waldrop
Jonathan K. Waldrop (CA Bar No. 297903)
(Admitted in this District)
jwaldrop@kasowitz.com
Darcy L. Jones (CA Bar No. 309474)
(Admitted in this District)
djones@kasowitz.com
Marcus A. Barber (CA Bar No. 307361)
(Admitted in this District)
mbarber@kasowitz.com
Heather S. Kim (CA Bar No. 277686)
(Admitted in this District)
hkim@kasowitz.com
John W. Downing (CA Bar No. 252850)
(Admitted in this District)
jdowning@kasowitz.com
ThucMinh Nguyen (CA Bar No. 304382)
(Admitted in this District)
tnguyen@kasowitz.com
Chen Jia (CA Bar No. 281470)
(Admitted *pro hac vice*)
cjia@kasowitz.com
KASOWITZ BENSON TORRES LLP
333 Twin Dolphin Drive, Suite 200
Redwood Shores, California 94065
Telephone: (650) 453-5170
Facsimile: (650) 453-5171

Paul G. Williams (GA Bar No. 764925)
(Admitted in this District)
pwilliams@kasowitz.com
KASOWITZ BENSON TORRES LLP
1230 Peachtree Street N.E., Suite 2445
Atlanta, Georgia 30309
Telephone: (404) 260-6080
Facsimile: (404) 260-6081

Joshua A. Whitehill (NY Bar No. 4766473)
(Admitted *pro hac vice*)
jwhitehill@kasowitz.com
Hershy Stern (NY Bar No. 4631024)
(Admitted *pro hac vice*)
hstern@kasowitz.com
Julianne Laporte (NY Bar No. 5547906)
(Admitted *pro hac vice*)
jlaporte@kasowitz.com
Howard L. Bressler (NY Bar No. 2487379)

(Admitted *pro hac vice*)
hbressler@kasowitz.com
Shelley Ivan (NY Bar No. 4338067)
(Admitted *pro hac vice*)
sivan@kasowitz.com
Noah P. Dorman (DC Bar No. 1779821)
(Admitted *pro hac vice*)
ndorman@kasowitz.com
KASOWITZ BENSON TORRES LLP
1633 Broadway
New York, NY 10019
Telephone: (212) 506-1700
Facsimile: (212) 506-1800

Mark D. Siegmund (TX Bar No. 24117055)
mark@swclaw.com
Craig D. Cherry (TX Bar No. 24012419)
craig@swclaw.com
Justin Allen (TX Bar No. 24081977)
justin@swclaw.com
STECKLER WAYNE CHERRY & LOVE PLLC
8416 Old McGregor Road
Waco, TX 76712
Telephone: (254) 651-3690
Facsimile: (254) 651-3689

Gregory Phillip Love (TX Bar No. 24013060)
greg@swclaw.com
STECKLER WAYNE CHERRY & LOVE PLLC
107 East Main Street
Henderson, TX 75652
Telephone: (903) 212-4444
Facsimile: (903) 392-2267

Attorneys for Plaintiff
WSOU INVESTMENTS, LLC d/b/a
BRAZOS LICENSING AND
DEVELOPMENT

By: /s/Lionel M. Lavenue
Lionel M. Lavenue
Virginia Bar No. 49,005
lionel.lavenue@finnegan.com
**FINNEGAN, HENDERSON, FARABOW,
GARRETT & DUNNER, LLP**
1875 Explorer Street, Suite 800
Reston, VA 20190
Phone: (571) 203-2700
Fax: (202) 408-4400

Attorney for Defendant,
ZTE Corporation

CERTIFICATE OF SERVICE

A true and correct copy of the foregoing instrument was served or delivered electronically to all counsel of record, on this 30th day of November 2022, via the Court's CM/ECF system.

/s/Lionel M. Lavenue
Lionel M. Lavenue